

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RECEIVED

BY

2/18/08

TILLIE SALTZMAN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

C ITIGROUP INC., CHARLES O. PRINCE,
ROBERT E. RUBIN, STEPHEN R. VOLK,
SALLIE L. KRAWCHECK, GARY L.
CRITTENDEN and ROBERT DRUSKIN,

Defendants.

CIVIL ACTION NO. 07-9901-SHS

LENNARD HAMMERSCHLAG, Individually,
and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,
SALLIE DRAWCHECK, GARY CRITTENDEN,

Defendants.

CIVIL ACTION NO. 07-10258-RJS

PUBLIC EMPLOYEES' RETIREMENT
ASSOCIATION OF COLORADO; TENNESSEE
CONSOLIDATED REITREMENT SYSTEM;
SJUNDE AP-FONDEN; FJÄRDE AP-FONDEN;
And PENSIONS KASSERNE
ADMINISTRATION A/S, Individually and Behalf
Of All Others Similarly Situated,

Plaintiffs,

CITIGROUP INC., CHARLES O. PRINCE,
SALLIE L. KRAWCHECK, GARY L.
CRITTENDEN, TODD S. THOMSON,

CIVIL ACTION NO. 08-00135-SHS

ECF CASE

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF N.Y.
2008 FEB 11 11:10:51

640969 #25 2-11-08 MQ

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TILLIE SALTZMAN, Individually and On
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v.

CITIGROUP INC., CHARLES O. PRINCE,
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ADMINISTRATION A/S, Individually and Behalf
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Plaintiffs,

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SALLIE L. KRAWCHECK, GARY L.
CRITTENDEN, TODD S. THOMSON,
ROBERT DRUSKIN, THOMAS G. MAHERAS,

CIVIL ACTION NO. 08-00135-SHS

ECF CASE

ROBERT DRUSKIN, THOMAS G. MAHERAS, :
MICHAEL STUART KLEIN, DAVID C. :
BUSHNELL, JOHN C. GERSPACH, STEPHEN :
R. VOLK, GEORGE DAVID, and KPMG LLP, :

Defendants. :
-----X

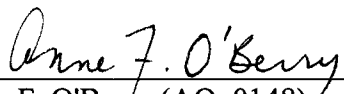
MOTION TO ADMIT COUNSEL *PRO HAC VICE*

PLEASE TAKE NOTICE that, upon the annexed declarations of Anne F. O'Berry and Michael J. Pucillo, and the exhibits attached thereto, Plaintiff hereby moves this Court pursuant to Local Civil Rule 1.3(c) for an order admitting Michael J. Pucillo of Berman DeValerio Pease Tabacco Burt & Pucillo, *pro hac vice* in connection with the above-captioned actions.

Dated: February 7, 2008

Respectfully submitted,

BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO



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Counsel for Plaintiff U.S. Public Fund Group

MICHAEL STUART KLEIN, DAVID C. :
BUSHNELL, JOHN C. GERSPACH, STEPHEN :
R. VOLK, GEORGE DAVID, and KPMG LLP, :
: :
Defendants. :
-----X

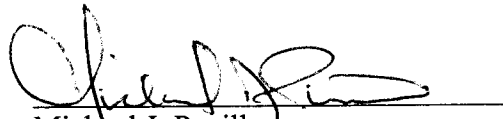
DECLARATION OF MICHAEL J. PUCILLO

Michael J. Pucillo declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a Partner in the law firm of Berman DeValerio Pease Tabacco Burt & Pucillo, counsel for Plaintiff in the above-captioned matter.
2. Berman DeValerio Pease Tabacco Burt & Pucillo maintains offices at 222 Lakeview Avenue, Suite 900, West Palm Beach, FL 33401. The telephone number is (561) 835-9400 and the fax number is (561) 835-0322.
3. I submit this declaration in support of Plaintiff's Motion to Admit Counsel *pro hac vice* in connection with this action, pursuant to Local Civil Rule 1.3(c) of this Court.
4. I have been admitted to practice in the State of Florida since 1978, and I am in good standing in the Florida Bar. *See* Exhibit A attached hereto (Certificate of Good Standing).
5. I also am admitted to practice before the United States Supreme Court, the United States Court of Appeals for the Fifth and Eleventh Circuits, and the United States District Courts for the Southern District of Florida, and Middle District of Florida.
6. I am familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the provisions of the Judicial Code that pertain to the jurisdiction of, and practice in, the United States District Court, the Local Rules of the United States District Courts for the Southern, and the Individual Rules of Practice of the Court.
7. I will adhere faithfully to all applicable rules in connection with my conduct before this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7 day of February, 2008, in West Palm Beach, Florida.



Michael J. Pucillo

EXHIBIT A



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

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850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 261033

Michael Jameson Pucillo
Berman Devalerio Pease Tabacco
222 Lakeview Ave., Ste. 900
West Palm Beach, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on November 16, 1978.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 6th day of February, 2008.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/smwaa8/R10

BY

DATE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Admit Counsel *Pro Hac Vice*, Declaration of Anne F. O'Berry, Declaration of Michael J. Pucillo, and Proposed Order Admitting Counsel *Pro Hac Vice* was served upon all counsel on the attached service list, via United States Mail, Postage Pre-Paid on this 7 day of February, 2008.

Anne F. O'Berry
Anne F. O'Berry

Saltzman v. Citigroup Inc., et al.
Case No. 07cv9901-SHS

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Hammerschlag v. Citigroup Inc. et al
Case No. 07cv10258-SHS

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John M. Deutch; Roberto Hernandez
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Kleinfeld; Andrew N. Liveris; Dudley C.
Mecum; Anne M. Mulcahy; Ricahrd D.
Parsons; Dr. Judith Rodin; Robert E. Rubin;
Robert L. Ryan; Franklin A. Thomas;
Windried Bischoff; Robert Druskin; William
R. Rhodes; David C. Bushnell; Steven J.
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Attorneys for Movant David Garden

Public Employees' Retirement Association of Colorado, et al.
v. Citigroup Inc. et al
Case No. 08cv00135-SHS

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Attorneys for Defendant KPMG LLP

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TILLIE SALTZMAN, Individually and On
Behalf of All Others Similarly Situated,

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ECF CASE

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BUSHNELL, JOHN C. GERSPACH, STEPHEN :
R. VOLK, GEORGE DAVID, and KPMG LLP, :
: :
Defendants. :
-----X

[PROPOSED] ORDER ADMITTING COUNSEL PRO HAC VICE

This matter having been brought before the Court by Plaintiff, through its counsel Berman DeValerio Pease Tabacco Burt & Pucillo, by motion pursuant to Local Rule 1.3(c) for an order admitting Michael J. Pucillo *pro hac vice*, it is hereby

ORDERED that Michael J. Pucillo, of the law firm of Berman DeValerio Pease Tabacco Burt & Pucillo, be and hereby are admitted *pro hac vice* in connection with the above-styled actions and that he shall abide by the provisions of the Local Rules of this Court in all respects.

SO ORDERED.

Dated this ____ day of _____, 2008.

United States District Judge